

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JOSEPH BRUNEAU,

Plaintiff,

v

Case No. 1:23-cv-178

HON. JANE M. BECKERING

GRAND VALLEY STATE UNIVERSITY,

MAGISTRATE JUDGE PHILLIP GREEN

Defendant.

Joseph Bruneau, pro se
32397 76th Street
Covert, Michigan 49043
(845) 768-2484

Edward J. Bardelli (P53849)
WARNER NORCROSS + JUDD LLP
1500 Warner Building
150 Ottawa Ave., NW
Grand Rapids, Michigan 49503
616.752.2165
ebardelli@wnj.com
Attorneys for Defendant

DEFENDANT GRAND VALLEY STATE UNIVERSITY'S MOTION TO DISMISS

For the reasons stated more fully in the accompanying brief in support, Defendant Grand Valley State University moves to dismiss the complaint (ECF No. 1, PageID.1) pursuant to Fed. R. Civ. P. 12(b)(6) because Plaintiff Joseph Bruneau has failed to state a claim upon which relief can be granted.

Date: March 14, 2023

/s/Edward J. Bardelli

Edward J. Bardelli (P53849)
WARNER NORCROSS + JUDD LLP
150 Ottawa Avenue, NW, Suite 1500
Grand Rapids, Michigan 49503
(616) 752-2165
ebardelli@wnj.com
Attorneys for Defendant

CERTIFICATE OF SERVICE

The undersigned states that a copy of Defendant Grand Valley State University's Motion to Dismiss was sent to Plaintiff by mailing it to him in compliance with Federal Rule of Civil Procedure 5(b)(2)(C) and W.D. Mich. LCivR 5.7(i)(iii) at his address listed on his Complaint on March 14, 2023.

/s/Edward J. Bardelli
Edward J. Bardelli (P53849)
Attorneys for Defendant